

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION**

FILED

MAY 02 2006

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY WFB DEPUTY CLERK

**AVINASH RANGRA,
ANNA MONCLOVA, &
All Other Public Officials in Texas,
Plaintiffs**

V.

CAUSE NO. P-05-CV-75

**FRANK D. BROWN,
83d JUDICIAL DISTRICT
ATTORNEY,
GREG ABBOTT,
TEXAS ATTORNEY GENERAL, and
THE STATE OF TEXAS,
Defendants**

**PLAINTIFF' PROPOSED TOMA SECTION
TO BE DECLARED UNCONSTITUTIONAL**

To the Court:

Should the Court declare that part of the Texas Open Meetings Act is unconstitutional, as violative of the First Amendment to the United States Constitution, then Plaintiffs propose the following sections of section 551, Texas Government Code, be struck down:

Sec. 551.001 (2) and (4)

Sec. 551.144.

Respectfully Submitted,


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ATTORNEYS FOR PLAINTIFFS

Certificate of Service

I hereby certify that I caused the foregoing Proposed TOMA Sections, to be served upon Defendants in accordance with the Federal Rules of Civil Procedure, and delivered a copy of same to James Todd, Assistant Attorney General and Steve Houston, via U.S. mail and fax, on this the 2d day of May, 2006.


Rod Ponton